

# **Exhibit 1**

**From:** [Nina Perales](#)  
**To:** [Robins, Jeffrey \(CIV\)](#); [Hu, Daniel \(USATXS\)](#); [Shumate, Brett A. \(CIV\)](#); [Celina Moreno](#); [Alejandra Avila](#); [Ernest Herrera](#)  
**Cc:** [Rachel Wainer Apter](#); [Kenneth Levine](#); [Jeremy Hollander](#)  
**Subject:** RE: TX v US (DACA) Discovery Requests for United States  
**Date:** Wednesday, June 06, 2018 5:18:12 PM

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Dear Jeff,

Thank you very much for your response. We will note your opposition, as indicated below, in our planned motion to take discovery.

Nina Perales  
Vice President of Litigation  
Mexican American Legal Defense  
and Educational Fund, Inc. (MALDEF)  
110 Broadway, Suite 300  
San Antonio, TX 78205  
Ph (210) 224-5476 ext. 206  
FAX (210) 224-5382

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**From:** Robins, Jeffrey (CIV) [mailto:Jeffrey.Robins@usdoj.gov]  
**Sent:** Wednesday, June 06, 2018 5:07 PM  
**To:** Nina Perales; Hu, Daniel (USATXS); Shumate, Brett A. (CIV); Celina Moreno; Alejandra Avila  
**Cc:** Rachel Wainer Apter; Kenneth Levine; Jeremy Hollander  
**Subject:** RE: TX v US (DACA) Discovery Requests for United States

Nina,

Thank you for your email. Given the early discovery that you seek here, and pursuant to Judge Hanen's rulings, Federal Defendants will not respond to your discovery request without a Court order. Additionally, the transcript from the status conference reflects Federal Defendants' position that no discovery is appropriate of Federal Defendants here, referring to the record of the prior proceeding as sufficient for the Court to make the legal determinations at issue.

Sincerely,

Jeff Robins

Jeffrey S. Robins  
Assistant Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-1246

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**From:** Nina Perales [mailto:nperales@MALDEF.org]  
**Sent:** Tuesday, June 05, 2018 11:33 PM

**To:** Robins, Jeffrey (CIV) <jerobins@CIV.USDOJ.GOV>; Hu, Daniel (USATXS) <Daniel.Hu@usdoj.gov>; Shumate, Brett A. (CIV) <bshumate@CIV.USDOJ.GOV>; Celina Moreno <cmoreno@MALDEF.org>; Alejandra Avila <Aavila@MALDEF.org>

**Cc:** Rachel Wainer Apter <Rachel.Apter@njoag.gov>; Kenneth Levine <Kenneth.Levine@law.njoag.gov>; Jeremy Hollander <Jeremy.Hollander@law.njoag.gov>

**Subject:** TX v US (DACA) Discovery Requests for United States

Dear Mr. Robins,

Please find attached Defendant Intervenors' first set of discovery requests for the United States. We would appreciate your response indicating whether the U.S. intends to respond to these discovery requests or whether you require us to secure an order from the court permitting Defendant Intervenors to take discovery of the U.S.

Thank you,